

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

PATRICIA HARRIS LEE,	-----X :	
	:	07 CV 6733 (CM)
Plaintiff,	:	<b>REPLY DECLARATION</b>
	:	<b><u>OF CLEMON WILLIAMS</u></b>
v.	:	
SONY BMG MUSIC ENTERTAINMENT, INC.	:	
and BARBARA WARNOCK-MORGAN,	:	
Individual,	:	
	:	
Defendants.	:	
	-----X	

CLEMON WILLIAMS declares as follows:

1. I am the Vice President of the Law Department of SONY BMG MUSIC ENTERTAINMENT ("SONY BMG"). I submit this reply declaration in further support of Defendants' motion dismissing the Second Amended Complaint. I have personal knowledge of the matters contained in this declaration and, if called upon, I could and would testify to each of the statements made herein.

2. As set forth in my previous declaration, Plaintiff never requested a transfer or reassignment to another position. When asked by independent insurance investigators what action she wanted the company to take, Plaintiff requested only that Defendant Warnock-Morgan's supervisors be made aware of the altercation. Williams Decl. at Exhibit B, at 88-89.

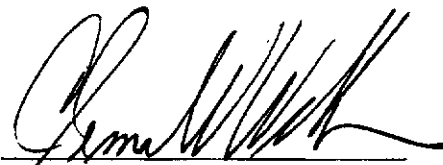
3. Plaintiff now asserts that she asked Kathleen Kelly of SONY BMG's Human Resources Department if she knew "what was going on in other departments and/or the possibility of being transferred or reassigned." Plaintiff further asserts that she

sent weekly e-mails to Ms. Kelly expressing her displeasure at working hand-in-hand with Warnock-Morgan. Declaration of Patricia Harris Lee at ¶¶16-18.

4. Plaintiff does not attach copies of e-mails to her declaration to support her assertions. Moreover, none of the handful of e-mails that Plaintiff did produce in the course of written discovery supports her assertion that she made inquiry regarding a transfer or reassignment away from her supervisor. The e-mails produced by Plaintiff are attached hereto as Exhibit A. Plaintiff's e-mail dated April 19, 2006 confirms that all she asked from Ms. Kelly was her unspecified "recommendations."

5. As stated above, Plaintiff's recorded statements to the insurance investigators also belie her assertion that she sought a transfer or reassignment or different position. Williams Declaration, Exhibit B at 88-89.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Executed at New York, New York, on this 21st day of August 2008.



CLEMON WILLIAMS